

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA : INDICTMENT
:
- v. - : 22 Cr.
:
TABITHA REICHERT, :
:
Defendant. : 22 CRIM 419
- - - - - X

COUNT ONE
(Threatening Interstate Communications)

The Grand Jury charges:

From at least in or about November 2021 to the present, in the Southern District of New York and elsewhere, TABITHA REICHERT, the defendant, knowingly transmitted in interstate and foreign commerce communications containing threats to injure the person of another, to wit, REICHERT sent emails, text messages, and voice messages, and posed on social media, threats to injure a particular individual ("Victim-1").

(Title 18, United States Code, Sections 875(c) and 2.)

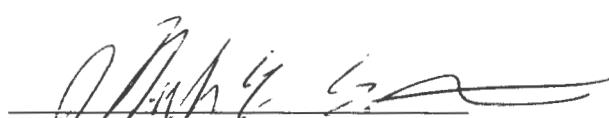
COUNT TWO
(Cyberstalking)

The Grand Jury further charges:

From at least in or about November 2021 to the present, in the Southern District of New York and elsewhere, TABITHA REICHERT, the defendant, in violation of a temporary

protection order as defined in Title 18, United States Code, Section 2266(5), with the intent to kill, injure, harass, intimidate, and place under surveillance with the intent to kill, injure, harass, or intimidate another person, used the mail, interactive computer services and electronic communication services and electronic communication systems of interstate commerce, and other facilities of interstate and foreign commerce, to engage in a course of conduct that (a) placed that person in reasonable fear of death or serious bodily injury, and (b) caused, attempted to cause, or would be reasonably expected to cause substantial emotional distress to that person, to wit, REICHERT sent emails, text messages, voice messages, and posted on social media, a series of violent, threatening, harassing, and intimidating messages, including messages in which she threatened to injure and kill Victim-1, while subject to a temporary order of protection from New York State Family Court not to contact Victim-1.

(Title 18, United States Code, Sections 2261A(2)(A), 2261A(2)(B), 2261(b)(5)&(6) and 2.)



Michael J. Gargiulo
FOREPERSON



Damian Williams
DAMIAN WILLIAMS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

TABITHA REICHERT,

Defendant.

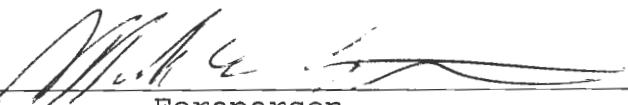
INDICTMENT

22 Cr.

(18 U.S.C. §§ 875(c), 2261A(2)(A),
2261A(2)(B), 2261(b)(5) & (6) and 2.)

DAMIAN WILLIAMS

United States Attorney


Foreperson

08/02/22

INDICTMENT FILED

(CA)

WHEELA - DJ SWAIN

KH PARKER
USM